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August 29, 2001

VIA HAND DELIVERY

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37201

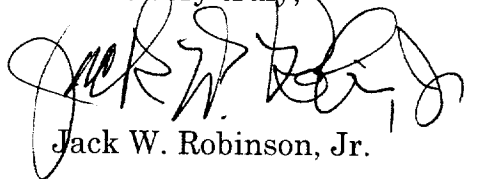
In Re: *Bellsouth Telecommunications, Inc.'s Entry Into Long Distance  
(InterLATA) Service in Tennessee Pursuant to Section 271 of the  
Telecommunications Act of 1996*

Dear Mr. Waddell:

Enclosed for filing are the original and thirteen copies of AT&T  
Communications of the South Central States, Inc.'s Request for Extension of Time.

Copies are being served on all known counsel of record.

Yours very truly,

  
Jack W. Robinson, Jr.

JWRjr./ghc  
Enclosures

cc: Sylvia Anderson, Esq.  
James P. Lamoureux, Esq.  
Garry Sharp

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

In Re: BellSouth Telecommunications,	)	
Inc.'s Entry Into Long Distance	)	
(InterLATA) Service in	)	
Tennessee Pursuant to Section	)	Docket No: 97-00309
271 of the Telecommunications	)	
Act of 1996	)	
	)	
	)	

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**AT&T'S REQUEST FOR EXTENSION OF TIME**

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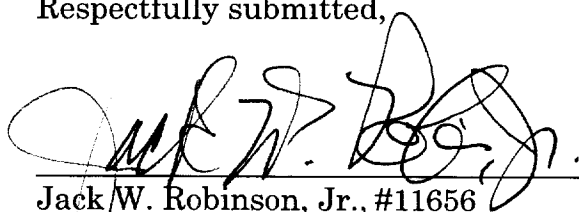
For the reasons set forth below, AT&T Communications of the South Central States, Inc. ("AT&T") requests a one (1) week extension to file a Motion to Compel addressing BellSouth's Objections filed August 24, 2001, to the discovery served on it by AT&T and others. The schedule set forth in the Tennessee Regulatory Authority's ("TRA") Notice of Filing dated August 28, 2001 (the "Notice"), set August 31, 2001 as the deadline for filing a Motion to Compel, but with a one (1) week extension, AT&T requests that this deadline be extended to 2:00 p.m. on Friday, September 7, 2001.

Counsel for AT&T did not actually receive BellSouth's Objections until August 28, 2001. Counsel for AT&T received the Notice on August 29, 2001, which, according to the deadline set forth therein, gives it only three (3) days from the time he received the Objections to prepare a Motion to Compel. AT&T will file a Motion to Compel, but it also needs the additional time because of the number of objections

made by BellSouth. BellSouth filed thirty-three (33) specific objections and nine (9) general objections to the discovery requests. After a preliminary review, AT&T believes that many of the objections BellSouth made to the discovery requests are generally not proper. The discovery sought from BellSouth is important to AT&T and others in order that it can fully inform the TRA of the true facts in this matter, so that the TRA can make a reasoned decision after being fully informed.

In its Motion to Compel, AT&T will specify why BellSouth's objections are not relevant, but AT&T needs additional time in order to properly do so. Reviewing all of BellSouth's objections in detail, reviewing the applicable law, and drafting and filing a Motion to Compel with the requisite specificity cannot be properly done in such a short time. Accordingly, AT&T requests the deadline for filing a Motion to Compel be extended until 2:00 p.m. on Friday, September 7, 2001.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jack W. Robinson, Jr.", is written over a horizontal line.

Jack W. Robinson, Jr., #11656  
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Attorneys for AT&T Communications of the  
South Central States, Inc.

## CERTIFICATE OF SERVICE

I, Jack W. Robinson, Jr., hereby certify that on this 29<sup>th</sup> day of August, 2001, a true and correct copy of the foregoing has been delivered via Facsimile or U. S. Mail, postage prepaid to the following counsel of record:

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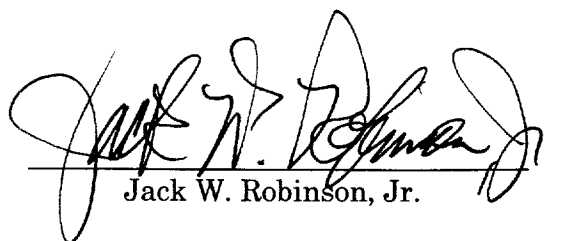
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Jack W. Robinson, Jr.